

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

ROBERT HALL AND MARY HALL,

Plaintiffs,

v.

Case No. 3:15-cv-1344-NJR-SCW

**AIR AND LIQUID SYSTEMS, INC.,
a/k/a BUFFALO PUMPS, INC., et al.,**

Defendants.

PLAINTIFF'S MOTION FOR PARTIAL VOLUNTARY DISMISSAL

COMES NOW Plaintiffs, Robert Hall and Mary Hall by and through counsel, and for his Motion for Partial Voluntary Dismissal of Counts IV and V Only, of Plaintiff's Complaint against Defendant General Electric Company, pursuant to Federal Rule of Civil Procedure 41(a)(2), states as follows:

1. Defendant, General Electric Company, has filed a Motion to Dismiss Counts IV and V of Plaintiff's Complaint (See, Doc.217)
2. Plaintiff herein moves to voluntarily dismiss Counts IV and V only of his Complaint against General Electric Company, without prejudice.
3. Dismissal of Counts IV and V only will not fully dismiss all claims against Defendant, and will not dispose of any Counterclaims filed by Defendant.
4. Plaintiff's voluntary dismissal of Counts IV and V only against Defendant would render Defendant's Motion to Dismiss moot (Doc. 217).

WHEREFORE, Plaintiff respectfully requests the Court grant Plaintiff's Motion for Partial Voluntary Dismissal, dismissing Counts IV and V only of Plaintiff's Complaint, without prejudice, against General Electric Company, and that it deny

Defendant's Motion to Dismiss as moot (Doc. 217), and for such other and further relief as this Court deems just and proper.

DATED: January 18, 2016

NAPOLI SHKOLNIK PLLC

By: /s/ Eric D. Jackstadt
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 18, 2016, a copy of the foregoing Motion was served upon all counsel of record via the court's ECF system.

/s/ Eric D. Jackstadt